

BETTS, PATTERSON & MINES P.S.

Christopher W. Tompkins (WSBA #11686)

CTompkins@bpmlaw.com

701 Pike Street, Suite 1400

Seattle, WA 98101-3927

BLANK ROME LLP

Henry F. Schuelke III (admitted *pro hac vice*)

HSchuelke@blankrome.com

600 New Hampshire Ave NW

Washington, DC 20037

James T. Smith (admitted *pro hac vice*)

Smith-jt@blankrome.com

Brian S. Paszamant (admitted *pro hac vice*)

Paszamant@blankrome.com

One Logan Square, 130 N. 18th Street

Philadelphia, PA 19103

Attorneys for Defendants Mitchell and Jessen

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE**

SULEIMAN ABDULLAH SALIM,
MOHAMED AHMED BEN SOUD,
OBAID ULLAH (as personal
representative of GUL RAHMAN),

Plaintiffs,

vs.

JAMES ELMER MITCHELL and
JOHN "BRUCE" JESSEN,

Defendants.

NO. 2:15-CV-286-JLQ

**DECLARATION OF
CHRISTOPHER W. TOMPKINS
IN SUPPORT OF DEFENDANTS'
UNOPPOSED MOTION TO
EXPEDITE CONSIDERATION
OF PENDING MOTION**

DECLARATION OF
CHRISTOPHER W. TOMPKINS
NO. 2:15-CV-286-JLQ

- 1 -

Betts
Patterson
Mines
701 Pike Street, Suite 1400
Seattle, Washington 98101-3927
(206) 292-9988

1 I, Christopher W. Tompkins, hereby certify under penalty of perjury, that the
2 following is true and correct and within my personal knowledge:

3 1. I am over the age of 18, have personal knowledge of all facts
4 contained in this declaration, and am competent to testify as a witness to those
5 facts.

6 2. I am one of the attorneys representing Defendants, James Elmer
7 Mitchell and John "Bruce Jessen (collectively, "Defendants") in this action.

8 3. Plaintiffs consent to the Joint Motion to Extend Deadlines.

9 4. Defendants request expedited consideration of the Joint Motion to
10 Extend Deadlines because an expedited decision will give the Parties certainty as
11 to as to the remaining discovery, pretrial, and trial deadlines, and allow the Parties
12 additional time to pursue settlement negotiations.

13 5. Counsel for Defendants notified chambers of this motion on March
14 14, 2017. Plaintiffs also consent to the expedited hearing of the Joint Motion to
15 Extend Deadlines.

16
17 s/ Christopher W. Tompkins
18 Christopher W. Tompkins

19 Executed this 14th day of March, 2017
20 at Seattle, Washington.

21
22
23
24
25
DECLARATION OF
CHRISTOPHER W. TOMPKINS
NO. 2:15-CV-286-JLQ

- 2 -

Beets
Patterson
Mines
701 Pike Street, Suite 1400
Seattle, Washington 98101-3927
(206) 292-9988

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of March, 2017, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Emily Chiang echiang@aclu-wa.org ACLU of Washington Foundation 901 Fifth Ave, Suite 630 Seattle, WA 98164	Paul Hoffman hoffpaul@aol.com Schonbrun Seplow Harris & Hoffman, LLP 723 Ocean Front Walk, Suite 100 Venice, CA 90291
Andrew I. Warden Andrew.Warden@usdoj.gov Senior Trial Counsel Timothy A. Johnson Timothy.Johnson4@usdoj.gov Trial Attorney United States Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave NW Washington, DC 20530	Steven M. Watt, admitted <i>pro hac vice</i> swatt@aclu.org Dror Ladin, admitted <i>pro hac vice</i> dladin@aclu.org Hina Shamsi, admitted <i>pro hac vice</i> hshamsi@aclu.org ACLU Foundation 125 Broad Street, 18th Floor New York, NY 10007
Avram D. Frey, admitted <i>pro hac vice</i> afrey@gibbonslaw.com Daniel J. McGrady, admitted <i>pro hac vice</i> dmcgrady@gibbonslaw.com Kate E. Janukowicz, admitted <i>pro hac vice</i> kjanukowicz@gibbonslaw.com Lawrence S. Lustberg, admitted <i>pro hac vice</i> llustberg@gibbonslaw.com Gibbons PC One Gateway Center Newark, NJ 07102	

By s/ Shane Kangas
 Shane Kangas
skangas@bpmlaw.com
 Betts, Patterson & Mines, P.S.

DECLARATION OF
 CHRISTOPHER W. TOMPKINS
 NO. 2:15-CV-286-JLQ

- 3 -

Betts
 Patterson
 Mines
 701 Pike Street, Suite 1400
 Seattle, Washington 98101-3927
 (206) 292-9988